

October 21, 2011

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Permitted Oral *Ex Parte* Presentation
WC Docket No. 10-90; GN Docket No. 09-51; WC Docket No. 07-135; WC Docket No. 05-337;
CC Docket No. 01-92; CC Docket No. 96-45 and WC Docket No. 03-109

Dear Ms. Dortch:

Representatives of the State of Alaska (“Alaska”) met with Commission officials this week to discuss the intercarrier compensation and universal service fund (“USF”) proceedings, the docket numbers for which are listed above. Attending the meetings on behalf of the State were Jim Kohler, Deputy Director, Enterprise Technology Services, Department of Administration, State of Alaska and Russ Kelly, Associate Director, Office of Governor Sean Parnell, State of Alaska. The Alaska representatives met on October 19, 2011 with Geoffrey Blackwell, Chief, Office of Native Affairs and Policy and his staff, Margaret McCarthy, Policy Advisor for Commissioner Michael J. Copps, Christine Kurth, Policy Director and Wireline Counsel for Commissioner Robert McDowell and Angela Kronenberg, Wireline Legal Advisor for Commissioner Mignon L. Clyburn.

During the meetings the Alaska representatives explained that USF reform should not alter Alaska’s full Tribal Lands exemptions until the long term Connect America Fund can be developed to support adequately Alaska’s on-going high cost demands for both telecommunication and broadband service and expansion across its rural areas. To do so would create immediate regulatory uncertainty thus eliminating Alaska carriers’ access to private investment. It was also explained that USF reform must include support for middle mile expansion for Alaska because, absent adequate middle mile support, broadband expansion will not occur. It was further explained that USF reform must not diminish current state regulatory authority and oversight of intrastate rate policies and USF delivery through eligible

October 21, 2011

Page 2

carriers. In addition, USF reform must not penalize Alaska and other states that have already implemented ICC reform by reducing USF revenues or increasing local end user monthly fees.

The Alaska representatives also provided a one-page summary of issues which is attached.

Please contact the undersigned, at 1-202-624-5988, if you have any questions about this filing.

Sincerely,

/s/ Russ Kelly

Russ Kelly
Associate Director
State of Alaska
Office of Governor Sean Parnell

ENCL